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12 Attorneys for Defendants,  
13 MAIN STREET MARKETING, LLC  
14 AND JERROD MCALLISTER

15  
16 **UNITED STATES DISTRICT COURT**  
17 **SOUTHERN DISTRICT OF CALIFORNIA**  
18

19 CLAUDINE OSGOOD, an individual;  
20 ANTON EWING, an individual,

21 Plaintiffs,

22 vs.

23 MAIN STREET MARKETING, LLC, a  
24 Utah limited liability company; JERRÔD  
25 ROBKER, an individual, aka JERROD  
26 MCALLISTER; DOES 1-100; ABC  
27 CORPORATIONS 1-100; XYZ, LLC's 1-  
28 100,

Defendants.

Case No. 3:16-cv-02415-GPC-BGS

Assigned to:  
District Judge, Hon. Gonzalo P. Curiel  
Magistrate Judge, Hon. Bernard G.  
Skomal

**NOTICE OF MOTION AND  
MOTION TO WITHDRAW AS  
ATTORNEY OF RECORD FOR  
DEFENDANTS MAIN STREET  
MARKETING, LLC AND JERROD  
MCALLISTER**

Date: April 21, 2017  
Time: 1:30 p.m.  
Courtroom: 2D

1 TO THE COURT, MAIN STREAT MARKETING, LLC, JERROD  
 2 JERROD MCALLISTER, AND ALL OTHER PARTIES:

3 PLEASE TAKE NOTICE THAT, on April 21, 2017 at 1:30 p.m., or as soon  
 4 thereafter as counsel may be heard in Department 2D of the above-entitled Court,  
 5 located at 221 West Broadway, San Diego, California 92101, counsel for  
 6 Defendants Main Streat Marketing, LLC and Jerrod McAllister aka Jerrod Robker  
 7 (collectively, "Defendants") will, and hereby do, move for an Order granting  
 8 counsel leave to withdraw as attorneys of record for Defendants pursuant to  
 9 Southern District Local Rule 83.3(f) and California Rules of Professional Conduct  
 10 3-700(C)(1)(d) and (f).

11 Good cause exists for this motion, as Defendants have ceased  
 12 communicating with counsel and have not paid the expenses and fees incurred by  
 13 counsel in defense of this action since its inception, as required by the parties'  
 14 engagement agreement.

15 This motion is based on this Notice of Motion, the concurrently filed  
 16 Memorandum of Points and Authorities, the Declaration of Ana Tagvoryan, all  
 17 pleading, papers and other documents on file in this action, and such further  
 18 evidence or argument as the Court may require or properly consider at or before  
 19 the hearing on this Motion.

20  
 21 Dated: February 7, 2017

22 BLANK ROME LLP

23 By: /s/ Ana Tagvoryan  
 24 Ana Tagvoryan  
 25 Safia Gray Hussain  
 26 Yosef A. Mahmood  
 27 Attorneys for Defendants  
 28 MAIN STREAT MARKETING, LLC  
 AND JERROD MCALLISTER